

**UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW JERSEY**

DARLERY FRANCO, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

CONNECTICUT GENERAL LIFE
INSURANCE CO., et al.,

Defendants.

Case No. 07-6039 (SRC) (CLW)

**NOTICE OF DEFENDANTS'
MOTION TO FILE EXHIBITS
UNDER SEAL PURSUANT TO
LOCAL CIVIL RULE 5.3**

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PLEASE TAKE NOTICE that on February 3, 2014, or an earlier date as to be set by the Court, Defendants Connecticut General Life Insurance Company, CIGNA Corporation, and CIGNA Health Corporation (“Defendants”), by and through their attorneys, Gibbons P.C. and Kirkland & Ellis LLP, shall move before the Honorable Cathy L. Waldor, U.S.M.J., United States District Court for the District of New Jersey, Dr. Martin Luther King Courthouse, Newark, New Jersey, for entry of an Order pursuant to the Order dated June 11, 2010 that set forth the protocol for a motion to seal and the Orders dated August 11, 2010, August 31, 2010, November 1, 2010, and February 8, 2012, to seal exhibits 4-5, 11-13, 15, 19-20, 23, 29, and 31 to the Declaration of William P. Deni, Jr. in support of Defendants’ Counter-Statement to Plaintiffs’ Statement of Undisputed Facts and Defendants’ Opposition to Plaintiffs’ Motion for Partial Summary Judgment, exhibit 18 to the Declaration of William P. Deni, Jr. in support of Defendants’

Motion to Exclude the Reports and Testimony of Dr. Stephen E. Foreman, exhibits 20-22 and 24-29 to the Declaration of William P. Deni, Jr. in support of Defendants' Opposition to Plaintiffs' Motion for Class Certification, exhibits 1-5 to the Declaration of Anita Hill in support of Defendants' Opposition to Plaintiffs' Motion for Class Certification, and exhibits 1-4 to the Declaration of Wendy Sherry in support of Defendants' Opposition to Plaintiffs' Motion for Class Certification, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon the enclosed Certification of William P. Deni, Jr., Brief, and Proposed Statement of Facts and Conclusions of Law. A proposed Form of Order is being submitted with this motion.

Respectfully submitted,

Dated: January 9, 2014
Newark, New Jersey

/s/ William P. Deni, Jr.
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